

**From:** Rochlin, Kevin  
**Sent:** Friday, December 06, 2013 5:47 PM  
**To:** Douglas.Tanner; Greutert, Ed [USA]; Kelly Wright; Scott Miller; Stifelman, Marc; susanh@ida.net; Zavala, Bernie  
**Cc:** Rochlin, Kevin  
**Subject:** FW: EPA responses to FMC's responses to the Hydro Study Comments  
**Attachments:** EPA responses to FMC responses to EPA comments dated and received September 13.docx  
  
**Categories:** 11-19 to 1-10 2014

See attached.

Kevin

**From:** Rochlin, Kevin  
**Sent:** Friday, December 06, 2013 5:45 PM  
**To:** Barbara Ritchie  
**Cc:** Rochlin, Kevin; Greutert, Ed [USA]; Zavala, Bernie  
**Subject:** EPA responses to FMC's responses to the Hydro Study Comments

We may want to set up a call to discuss.

Kevin



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**REGION 10**  
1200 Sixth Avenue, Suite 900  
Seattle, Washington 98101-3140

October 6, 2013

Reply to  
Attn. of ECL-111

Ms. Barbara Ritchie  
FMC Corporation  
1735 Market Street  
Philadelphia, Pennsylvania 19103

**RE: Unilateral Administrative Order for Remedial Design and Remedial Action**  
**EPA Docket No. CERCLA 10-2013-0116**

**EPA review of FMC responses to comments on the Extraction Zone Hydrogeologic Study**  
**Work Plan submitted July 15, 2013**

Dear Ms. Ritchie:

EPA has reviewed the FMC responses to comments on the referenced document. There are still a few issues that have not been adequately addressed. Please let me know if you would like to hold a conference call to discuss these.

Sincerely,

Kevin Rochlin,  
Project Manager

Enclosure

Type/ Well #		Analytical parameters	QA/QC Samples Field Dup. MS/MSD		Total Samples Field                  QA/QC                  Final		
6-hour Step test	EW-01	See table 3.2 for WQP & Metals	1	1	2	1	3
	EW-02	See table 3.2 for WQP & Metals			2		2

	EW-03	See table 3.2 for WQP & Metals			2		2
72-hour pump test	Composite (EW-01, 02, &03)	See table 3.2 for WQP & Metals	1	1	3	1	4
	Bulk (EW-01,02, &03)	See table 3.2 for WQP & Metals	1	1	1	1	2
							13

FD: Field duplicates at a rate of 1 per 10 samples

MS/MSD: Matrix spikes- matrix spike duplicates 1 per 20 samples per type.

### Comment #12 (two parts)

#### Part 1:

EPA understands the response but the overall goal is to achieve containment and restoration of the groundwater. The refinement of the HCS should be based on site specific groundwater quality and the hydraulic of the aquifer parameters. The EPA is generally okay with the locations for EW-01, 2 &3. Based on findings from this field work discussions will need to take place for the other two extraction wells locations.

#### Part 2:

EPA is still not clear on the logistics on how the purge water will be managed during the 72-aquifer test. EPA agrees based on the water quality from the monitoring wells the purge water is non-hazardous. EPA is expecting a short description of the handling of the water and where it will be stored until it can be used for dust control. Sampling may be required depending on how FMC intends to store water prior to spreading.

Resolution: Amend the document to more fully describe water disposal. Sampling per EPA requirements if EPA determines that it is necessary.

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### **Shoshone- Bannock Tribes' Comments**

The Tribes maintains their position on the General Comment. The Tribes reserve the right to re-evaluate the groundwater model report and assumptions derived from that report

including parameters selected for flow and contaminant transport models, assess reasonableness of predicted parameters, and gain better understanding of sorption coefficients, dispersivity and porosity.

Resolution: EPA agrees that the Tribes may re-evaluate the groundwater model. No change is required to the document.

Second bullet section 2.1.4. Tribes maintain this statement should be added. The statement is accurate.

Resolution: This change needs to be made in the document.

The Tribes maintain their request on sampling prior to any water being discharged on Tribal lands or State lands. The Tribes do not agree with FMC response that aluminum, antimony, beryllium, cadmium, copper, lead, molybdenum, mercury, silver, thallium, zinc, organic compounds, and radionuclides are not FMC related contaminants. The Tribes believe these are FMC related contaminants as shown historically in the sampling efforts.

Resolution: See EPA comment response #12. Sampling may be required prior to discharge.

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#### IDEQ Comments

**1. Page B-14, section B.4.1.1, step 9 and section B.4.2.1 step 2;**

This discussion leads the reader to conclude the data loggers will be set after the start of pumping, resulting in the loss of early time data. Please revise the text to clearly state data loggers are to be set prior to the start of pumping.

Resolution: Make the change required in the comment.